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**STATE OF WASHINGTON  
DEPARTMENT OF FINANCIAL INSTITUTIONS  
SECURITIES DIVISION**

IN THE MATTER OF DETERMINING  
whether there has been a violation  
of the Securities Act of Washington by:

LAURA KENT; CORNERSTONE ASSET  
MANAGEMENT; AND CORNERSTONE  
INVESTMENT CIRCLE, LLC,

Respondents.

Order No. S-00-044-04-CO01

CONSENT ORDER AND ORDER  
VACATING SDO-104-00

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**INTRODUCTION**

On October 31, 2000, the Securities Division, Department of Financial Institutions, State of Washington (the "Securities Division"), issued a Summary Order to Cease and Desist SDO-104-00 (the "Summary Order") against Respondents Laura Kent, Cornerstone Asset Management, and Cornerstone Investment Circle, LLC. In the Summary Order, the Securities Division made certain allegations and conclusions, set forth under the headings "Tentative Findings of Fact" and "Conclusions of Law." After entry of the Summary Order, no new information has come to the attention of the Securities Administrator requiring the amendment of the Summary Order. Laura Kent, Cornerstone Capital Management, Inc. and Cornerstone Investment Circle, LLC hereby each represent that they have made no offer or sale of interests in the "Bank Debenture Program" or Cornerstone Investment Circle, LLC as described in the Tentative Findings of Fact, since the entry of the Summary Order. Pursuant to the Securities Act of Washington, RCW 21.20, the Securities Division and Laura Kent, Cornerstone Capital Management, Inc. and Cornerstone Investment Circle, LLC do each hereby enter into this Consent Order and Order Vacating SDO-104-00 in settlement of the above captioned matter. Laura Kent, Cornerstone

1 Capital Management, Inc. and Cornerstone Investment Circle, LLC neither admit nor deny the Tentative  
2 Findings of Fact and Conclusions of Law, which are incorporated by reference into this Consent Order.

3 **CONSENT ORDER**

4 Based upon the foregoing,

5 IT IS AGREED AND ORDERED that Laura Kent, Cornerstone Capital Management, Inc. and  
6 Cornerstone Investment Circle, LLC, and their agents, employees, affiliates, and successors shall each  
7 cease and desist from offering and selling securities in any manner in violation of RCW 21.20.140, the  
8 securities registration section of the Securities Act of Washington.

9 IT IS FURTHER AGREED AND ORDERED that Laura Kent, Cornerstone Capital  
10 Management, Inc. and Cornerstone Investment Circle, LLC, and their agents, employees, affiliates, and  
11 successors shall each cease and desist from violation of RCW 21.20.010, the anti-fraud section of the  
12 Securities Act of Washington.

13 IT IS FURTHER AND ORDERED that Laura Kent, Cornerstone Capital Management, Inc. and  
14 Cornerstone Investment Circle, LLC, and their agents, employees, affiliates, and successors shall each  
15 cease and desist from acting as an unregistered securities broker/dealer or salesperson in violation of  
16 RCW 21.20.040.

17 IT IS FURTHER AGREED that the Securities Division has jurisdiction to enter this Consent  
18 Order.

19 In consideration of the foregoing, Laura Kent, Cornerstone Capital Management, Inc. and  
20 Cornerstone Investment Circle, LLC each waive their rights to a hearing in this matter and to judicial  
21 review of this matter pursuant to RCW 21.20.440 and Chapter 34.05 RCW, and the Securities Division  
22 hereby vacates the Summary Order.

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Approved for entry by:

/s/ John A. Bender

John A. Bender, Esq.

WSBA No. 19540

Ryan, Swanson & Cleveland, PLLC

Attorney for Laura Kent, Cornerstone Capital Management, Inc. and Cornerstone Investment Circle, LLC

Signed by:

Cornerstone Capital Management, Inc.

/s/ Laura Kent

Laura Kent, President

Cornerstone Investment Circle, LLC

/s/ Laura Kent

Laura Kent, Manager

/s/ Laura Kent

Laura Kent, individually

THIS CONSENT ORDER SIGNED THIS \_\_\_\_9<sup>th</sup>\_\_\_\_ DAY OF \_\_September\_\_, 2004

1 THIS CONSENT ORDER ENTERED THIS 23rd DAY OF SEPTEMBER, 2004 BY:

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MICHAEL E. STEVENSON  
Securities Administrator

5 Approved for entry by:

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Martin Cordell  
Chief of Enforcement

9 Presented by:

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Chad C. Standifer  
Staff Attorney